

The Honorable Jamal N. Whitehead

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MARK JOHNSON,

Plaintiff,

vs.

EQUIFAX INFORMATION SERVICES,
LLC, EXPERIAN INFORMATION
SOLUTIONS, INC., TRANSUNION, LLC,
and, REAL TIME RESOLUTIONS, INC,

Defendants.

Case No. 2:23-cv-00222-JNW

**STIPULATED MOTION FOR
EXTENSION OF TIME TO FILE
RESPONSIVE PLEADING TO
COMPLAINT, AND ORDER**

Note on Motion Calendar: May 1, 2023

STIPULATED MOTION

Defendant Equifax Information Services LLC (“Equifax”), by their attorneys and pursuant to Local Rules 7 and 10 of the Western District of Washington, moves for an extension of time in which to answer or otherwise respond to the Complaint in this matter. It is stipulated and agreed to by and among counsel, that defendant Equifax Information Services LLC’s time to answer, move or otherwise respond to the Complaint in this action is extended from May 1, 2023, through and including May 31, 2023. In support of its Motion, defendant states:

1. On February 20, 2023, Plaintiff filed a Complaint in the United States District Court for the Western District of Washington. (ECF No. 1).

2. Equifax was served via waiver on March 2, 2023.

3. Pursuant to Rules 12 and 8 Federal Rule of Civil Procedure, Equifax must file its responsive pleading by May 1, 2023.

4. On April 25, 2023, counsel for Equifax conferred with plaintiff's counsel to confirm that Plaintiff had no objection to extending Equifax's deadline to answer or respond to plaintiff's Complaint. Plaintiff's counsel confirmed that plaintiff consents to Equifax's requested extension.

5. Thus, to allow Equifax additional time to investigate plaintiff's allegations and to continue informal settlement discussions with plaintiff's counsel, Equifax respectfully requests an extension of time to answer or otherwise respond to plaintiff's Complaint through and including May 31, 2023.

6. This motion is filed before Equifax's response to plaintiff's Complaint is due. Equifax's request is not sought for the purpose of delay, nor will the additional time adversely affect the just, speedy, and inexpensive determination of this action. *See* Fed. R. Civ. P. 1.

7. This motion is filed in good faith and is supported by good cause.

WHEREFORE, Equifax respectfully requests the Court to issue an Order extending the time for Equifax to answer or otherwise respond to plaintiff's Complaint through and including May 31, 2023.

DATED this May 1, 2023.

MARKOWITZ HERBOLD PC

By: *s/ Jeffrey M. Edelson*

Jeffrey M. Edelson, WSBA #37361
JeffEdelson@MarkowitzHerbold.com

Of Attorneys for Defendant Equifax
Information Services, LLC

McCARTHY LAW, PLC

By: */s/ Joseph M. Panvini*

Joseph M. Panvini
Joe.panvini@mccarthylawer.com

Attorney for Plaintiff

ORDER

Based upon the foregoing Stipulated Motion for Extension of Time to Answer or Otherwise Plead, the Court hereby ORDERS AND ADJUDGES as follows:

1. The Stipulated Motion is GRANTED and ACCEPTED by the Court.
2. Defendant Equifax Information Services, LLC shall answer or otherwise respond to the Complaint by May 31, 2023.

DATED this 9th day of May, 2023.



Jamal N. Whitehead
United States District Judge

Presented by:

s/Jeffrey M. Edelson

Jeffrey M. Edelson, WSBA #37361
JeffEdelson@MarkowitzHerbold.com

Attorney for Defendant Equifax Information
Services, LLC